

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Otharine Singleton,)	
)	
Plaintiff,)	
)	
vs.)	C/A No.: 2:20-cv-3196-RMG-MHC
)	
)	MOTION TO BE RELIEVED
HCR ManorCare, Heartland Employment)	
Services, LLC, Heartland Hospice Services,)	
LLC, d/b/a Heartland Hospice Services –)	
Charleston, Heather Knicely,)	
Vickie Bennett, and Mona Kirkland, in their)	
individual capacities,)	
)	
Defendants.)	
_____)	

1. This action was originally filed in Federal District Court with movant, Aaron V. Wallace, listed as counsel of record along with Donald Gist of the Gist Law Firm, PA.
2. Since the filing of this lawsuit, movant has litigated this case as counsel of record as an attorney at the Gist Law Firm, PA. Nevertheless, as of November 2020, movant has given notice of intent to end his employment relationship with the Gist Law Firm, PA. As such, movant is respectfully requesting that this honorable Court relieve him of his obligations as counsel of record in this case.
3. Donald Gist, Esquire and Imani Newborn, Esquire continue to practice at the Gist Law Firm, PA and remain (and will remain) counsel of record for the Plaintiff in this case, thus Plaintiff will not be left unrepresented.
4. In compliance with Local Rule 83.I.07(b)(3), movant hereby certifies that the Plaintiff has been provided a copy of this motion and an explanation of the party's right to object to

movant's withdrawal via writing to the court within seventeen days (17) of the filing of this motion.

5. This motion is not being made to delay the case, but for good cause shown above and due to the fact that movant will no longer be employed with the Gist Law Firm, PA.
6. Movant, therefore, respectfully requests that he be fully discharged from representation in this case and that he have no further legal responsibilities to Plaintiff regarding this matter.

Respectfully submitted,

s/Aaron Wallace

Aaron Wallace (Fed. ID No. 11469)

aaronwallace@gistlawfirm.com

Donald Gist (Fed. ID No. 13098)

dtommygist@yahoo.com

GIST LAW FIRM, P.A.

440 North Main Street (29203

Post Office Box 30007

Columbia, South Carolina 29230

Phone: 803.771-8007

Fax: 803.771-0063

Attorneys for Plaintiff

Columbia, South Carolina

s/Donald Gist

Aaron Wallace (Fed. ID No. 11469)

aaronwallace@gistlawfirm.com

Donald Gist (Fed. ID No. 13098)

dtommygist@yahoo.com

GIST LAW FIRM, P.A.

440 North Main Street (29203

Post Office Box 30007

Columbia, South Carolina 29230

Phone: 803.771-8007

Fax: 803.771-0063

Attorneys for Plaintiff

Columbia, South Carolina

October 27, 2020

